

EXHIBIT D

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION

SARAH RICCIARDI,

Plaintiff,

v.

Case No.: 4:14-cv-00544

STSI, LLC d/b/a STATE TACTICAL
SECURITY AND INVESTIGATIONS, and
ROBERT MARQUEZ, JR.,

Defendants.

DECLARATION OF JONATHAN SANDSTROM HILL

1. My name is Jonathan Sandstrom Hill and I am over 18 years of age, competent to make this declaration, and making this declaration pursuant to the provisions of 28 U.S.C. § 1746.

2. I am a licensed attorney practicing in Travis County, Texas. I represent the Plaintiff in this matter.

3. I was admitted to the Virginia bar from 2009 until 2012 and have been a member of the Texas Bar since 2011. I have practiced exclusively in the area of employment law my entire practice, including claims brought under the Fair Labor Standards Act.

4. I am familiar with the rates charged by attorneys with similar experience in the Southern District of Texas. A reasonable hourly fee for a lawyer with similar experience and expertise is \$300.00 per hour. I have previously been awarded \$300.00 per hour in three cases before this court. *See Trina Smith v. Securemax Protective Services, LLC, et al.*, C.A. No.: 4:13-cv-03008; *Misael Galo v. Tara Rameshwarsingh d/b/a T.B.S. Road Service*, C.A. No.: 4:14-cv-01149; *Jamar Butler v. Securemax Protective Services, LLC, et al.*, C.A. No.: 4:13-cv-03666.

5. James V. Sylvester has been a member of the Texas Bar since 1978. He has over thirty years of experience in different types of practices. I am familiar with the rates charged by attorneys with similar experience in the Southern District of Texas. A reasonable hourly fee for a lawyer with similar experience and expertise is \$425.00 per hour.

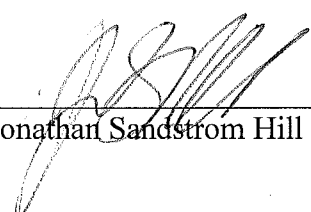
6. Thomas H. Padgett, Jr. has been a member of the Texas Bar since 1989 engaging in various types of litigation and trial practice. He has tried over fifty cases to a verdict in State and Federal Court. I am familiar with the rates charged by attorneys with similar experience in the Southern District of Texas. A reasonable hourly fee for a lawyer with similar experience and expertise is \$425.00 per hour. Mr. Padgett has previously been awarded \$425.00 per hour in two

FLSA cases in the Southern District of Texas. *See McNiel v. Gold & Silver Buyers, Inc.*, C.A. No. 4:13-cv-03206; *Medina v. Aramaco Auto Glass, Inc., et al.*, C.A. No.: 4:13-cv-02566.

7. The Ross Law Group performed the services on the dates for the time indicated in the attached time records.

8. The Plaintiff in this case has incurred a filing fee of \$400.00.

I declare under penalty and perjury under the laws of the United States of America that the foregoing is true and correct. Executed on October 7, 2014, in Austin, Texas.



Jonathan Sandstrom Hill

**Ross Law P.C.
The Allan House
1104 San Antonio Street
Austin, Texas 78701**

Invoice Submitted to:
Sarah Ricciardi
3230 S. Gessner Road, Apt. 1902
Houston, Texas 77063

Statement Date: 7-Oct-14
Statement No.: 5880
Account No.: 58541

FEES

Date	Atty/Ast.	Description	Rate Per		Amount
			Hrs.	Hour	
1/27/2014	MEE	Telephone conference with Client re: status of case, gather facts for drafting of complaint	0.5	\$95.00	\$47.50
2/11/2014	MEE	Draft complaint	0.6	\$95.00	\$57.00
2/14/2014	JVS	Reviewed complaint; discussed matter with CS; researched res judicata effect of TWC proceedings; made visit to TWC to secure wage file under Open Records Act; telephone call with client - draft case assessment	3.5	\$425.00	\$1,487.50
2/21/2014	JVS	Update case assessment; revisions to complaint	0.75	\$425.00	\$318.75
2/26/2014	JVS	meet with Sandstrom Hill re assignemet of Ricciardi case - NC	0.2	\$0.00	\$0.00
2/26/2014	JSH	review case file and assessment memo	0.3	\$300.00	\$90.00
2/26/2014	JSH	Meet with Sylvester re assignment of Ricciardi case to me - NC	0.2	\$0.00	\$0.00
3/10/2014	JSH	Telephone Conference with client	0.2	\$300.00	\$60.00
3/10/2014	JSH	Review order for initial pretrial conference	0.1	\$300.00	\$30.00
3/10/2014	MEE	Draft request to appear at pre-trial conference - NC	0.5	\$0.00	\$0.00
3/10/2014	MEE	Mailed request to appear at pre-trial conference by phone - NC	0.2	\$0.00	\$0.00
3/10/2014	MEE	Draft Certificate of Interested parties	0.1	\$95.00	\$9.50
3/10/2014	MEE	File Certificate of Interested Parties	0.1	\$95.00	\$9.50
3/14/2014	MEE	Email correspondence from court re appearance by phone	0.1	\$95.00	\$9.50
4/9/2014	MEE	Telephone Conference with Client	0.2	\$95.00	\$19.00
4/9/2014	MEE	Email correspondence to/from client providing info on how to obtain W2/file taxes without one	0.1	\$95.00	\$9.50
4/14/2014	MEE	Receipt of signed summons by clerk	0.3	\$95.00	\$28.50
4/17/2014	JSH	Telephone Conference with Charles Jeremiah re waiving service	0.2	\$300.00	\$60.00
4/21/2014	MEE	Email correspondence from Charles Jeremiah waiving service - NC	0.1	\$0.00	\$0.00
4/21/2014	MEE	Draft waiver of service for STSI and Robert Marquez, Jr. and letter to opposing counsel	0.5	\$95.00	\$47.50
4/22/2014	JSH	Telephone Conference with client - email to Charles Jeremiah	0.3	\$300.00	\$90.00
4/22/2014	MEE	Mail to opposing counsel: waiver of service	0.2	\$95.00	\$19.00
4/28/2014	MEE	Receipt and review of Waiver of Service	0.2	\$95.00	\$19.00
4/28/2014	MEE	File documents with Court: Waiver of Service	0.3	\$95.00	\$28.50
4/28/2014	MEE	Receipt and review of filed waiver of service	0.1	\$95.00	\$9.50
5/1/2014	JSH	Telephone Conference with Charles Jeremiah	0.2	\$300.00	\$60.00
5/2/2014	JSH	left message for client	0.1	\$300.00	\$30.00
5/5/2014	JSH	Telephone Conference with client	0.3	\$300.00	\$90.00

Date	Atty/Ast.	Description	Hrs.	Rate Per	Amount
				Hour	
5/8/2014	JSH	left message for client	0.1	\$300.00	\$30.00
5/9/2014	JSH	left message for Charles Jeremiah	0.1	\$300.00	\$30.00
5/16/2014	MCC	Draft motion to continue initial conference	0.4	\$95.00	\$38.00
5/16/2014	JSH	reivew draft motion to continue initial pretrial and scheduling conference	0.1	\$300.00	\$30.00
5/16/2014	MCC	File mt. for continuance of initial conference with court	0.1	\$95.00	\$9.50
5/20/2014	MCC	Receipt and review of order granting mt. to continue initial conference	0.2	\$95.00	\$19.00
6/2/2014	JSH	Telephone Conference with Charles Jeremiah	0.2	\$300.00	\$60.00
6/2/2014	JSH	review client time records and calculate damages	0.8	\$300.00	\$240.00
6/3/2014	JSH	Telephone Conference with client regarding her damages and a settlement demand	0.2	\$300.00	\$60.00
6/3/2014	JSH	email to Charles Jeremiah with settlement demand	0.2	\$300.00	\$60.00
6/6/2014	MCC	Receipt of D's offer of judgment - NC	0.1	\$0.00	\$0.00
6/10/2014	JSH	Telephone Conference with client regarding offer of judgment	0.3	\$300.00	\$90.00
6/12/2014	MCC	Telephone Conference with case manager re. initial conference	0.1	\$95.00	\$9.50
6/12/2014	MCC	Email correspondence to case manager re. initial conference	0.1	\$95.00	\$9.50
6/12/2014	JSH	email to opposing counsel re accepting offer of judgment	0.1	\$300.00	\$30.00
6/18/2014	MCC	Email correspondence to/from court case manager re. initial conference	0.1	\$95.00	\$9.50
6/23/2014	MCC	Draft joint motion to continue initial conference	0.3	\$95.00	\$28.50
6/23/2014	JSH	review motion to continue initial conference	0.2	\$300.00	\$60.00
6/23/2014	MCC	File joint motion to continue initial conference	0.1	\$95.00	\$9.50
6/24/2014	MCC	Draft notice of appearance for TP	0.1	\$95.00	\$9.50
6/24/2014	MCC	Fax copy of notice of appearance to Opposing Counsel; file same with court	0.2	\$95.00	\$19.00
6/24/2014	MCC	Receipt and review of notice of resetting of initial conference	0.1	\$95.00	\$9.50
6/25/2014	MCC	Email correspondence to Padgett re. Ricciardi reset	0.1	\$95.00	\$9.50
6/25/2014	MCC	Receipt and review of order to continue pretrial conference	0.1	\$95.00	\$9.50
6/26/2014	JSH	read correspondence from opposing counsel - telephone conference with client - research re necessity of fees/reduction of fees due to low recovery - email to opposing counsel	0.3	\$300.00	\$90.00
7/22/2014	JSH	Telephone Conference and email to opposing counsel re amount of attorneys' fees	0.2	\$300.00	\$60.00
8/7/2014	JSH	Telephone Conference with client	0.2	\$300.00	\$60.00
8/14/2014	JSH	email to opposing counsel re atty fees settlement	0.1	\$300.00	\$30.00
8/27/2014	JSH	email to opposing counsel	0.1	\$300.00	\$30.00
8/27/2014	JSH	left message for opposing counsel	0.1	\$300.00	\$30.00
8/27/2014	JSH	Telephone Conference with opposing counsel	0.2	\$300.00	\$60.00
9/3/2014	JSH	email to opposing counsel re agreement reached on attorneys' fees amount	0.1	\$300.00	\$30.00
9/5/2014	JSH	email to opposing counsel re payment plan	0.1	\$300.00	\$30.00
9/8/2014	JSH	left message for opposing counsel - email to opposing counsel re setting time to talk about payment plan	0.1	\$300.00	\$30.00

Date	Atty/Ast.	Description	Hrs.	Rate Per	Amount
				Hour	
9/8/2014	JSH	Telephone Conference with opposing counsel re payment plan	0.2	\$300.00	\$60.00
9/9/2014	JSH	Telephone Conference with client	0.2	\$300.00	\$60.00
9/9/2014	JSH	Draft JDCMP and email to Jeremiah	0.6	\$300.00	\$180.00
9/9/2014	MCC	File JDCMP with court	0.1	\$95.00	\$9.50
9/10/2014	TP	Receipt and review of documents in case, order for conference, review email regarding case - NC	0.7	\$0.00	\$0.00
9/10/2014	TP	Attend and participate in conference with court, travel to and return from federal court in Houston	1	\$425.00	\$425.00
9/10/2014	JSH	Telephone Conference with opposing counsel re payment plan	0.2	\$300.00	\$60.00
9/10/2014	JSH	telephone conference with Padgett - email Padgett - re case status and conference	0.1	\$300.00	\$30.00
9/12/2014	MCC	Email correspondence from court re. status conference	0.1	\$95.00	\$9.50
9/25/2014	JSH	left message for client	0.1	\$300.00	\$30.00
9/26/2014	JSH	Telephone Conference with client - email to opposing counsel re payment plan	0.1	\$300.00	\$30.00
10/6/2014	JSH	Draft motion for final judgment and for attorneys' fees	2	\$300.00	\$600.00
TOTAL FEES:					\$5,453.75
COSTS					
Filing Fees					\$400.00
TOTAL COSTS:					\$400.00
Balance Due					\$5,853.75